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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

AUG 2 2 2002

REDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In the Matter of)	
)	
Revision of the Commission's Rules	to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced E911 Emergency)	
Calling Systems)	

To: The Commission

Quarterly Report of Thumb Cellular Limited Partnership Regarding TTY Access to Digital Wireless Systems and Request for a Brief Extension of the TTY Deadline

Thumb Cellular Limited Partnership (Reporter) hereby submits its quarterly report regarding implementation of Text Telephone access (TTY) to digital wireless systems in compliance with the FCC's Fourth Report and Order in the captioned proceeding. 66 Fed. Reg. 35430 (July 5, 2001).

Reporter is licensed to provide cellular service in Michigan and Reporter utilizes Century Cellunet's nearby switching facility and is thus dependant upon Century Cellunet for TTY availability. It is Reporter's understanding that Century Cellunet's digital TTY implementation efforts are dependent upon Nortel's provision of suitable hardware/software solutions in order to implement digital TTY and that Reporter and Century Cellunet are also dependent upon the availability of compatible TTY handsets. In the last report we requested an extension of the TTY requirement until September 30, 2002. We have been advised by Century that TTY testing in each of Century's switches began in August 2002 and that "it will take a few months to get through all the switches." At the time Century provided the information, there was no set schedule for testing and rolling out the Lansing switch leased by Thumb Cellular. Because progress is being made toward implementation, however, because installation and testing of the required software is beyond Reporter's control. Reporter seeks a further brief extension of the June 2002 TTY deadline to December 30, 2002.

Respectfully submitted, Timothy E. Welch Hill & Welch 1330 New Hampshire Ave., N.W. #113 Washington, D.C. 20554 202-775-0070[9026] [FAX]